

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

OMNI DEVELOPMENT
CORPORATION,

Plaintiff,

v.

CONNOLLY AND PARTNERS, LLC,
FHRC MANAGEMENT CORPORATION,
FIRST HARTFORD CORPORATION, and
NEIL H. ELLIS,

Defendants,

and

ROCKVILLE BANK,

Reach and Apply
Defendant,

ROCKLAND TRUST,
BANK OF AMERICA, N.A.,
RBS CITIZENS BANK,
SOVEREIGN BANK,
FIDELITY MANAGEMENT AND
RESEARCH COMPANY,
WAINWRIGHT BANK & TRUST
COMPANY,
EASTERN BANK, and
MECHANICS COOPERATIVE BANK,

Trustee Defendants.

CIVIL ACTION NO.

1:10-cv-12017 WGY

JOINT MOTION TO STAY THE LITIGATION

Plaintiff Omni Development Corporation and Defendants Connolly and Partners, LLC, FHRC Management Corporation, First Hartford Corporation, and Neil H. Ellis (hereafter collectively referred to as the "Parties"), by their attorneys, respectfully request the Court to stay

the litigation on the grounds that they have reached a settlement, signed a settlement agreement and are awaiting the approval of the required Massachusetts Housing Finance Authority, the Massachusetts Department of Housing and Community development, Boston Capital Partners, Inc. and if necessary, the United States Department of Housing and Urban Development, or in each case, others whom it controls, grants the approval that is required of such party, for whatever part of the settlement agreement requires such approval. Within ten days of the receipt of such approval, the Parties' counsel shall file with this Court an Agreement for Judgment or such other document of dismissal as is acceptable to the Court.

Respectfully submitted,

/s/Pamela Berman

Pamela E. Berman, (BBO# 551806)
ADLER POLLOCK & SHEEHAN P.C.
175 Federal Street, 10th Floor
Boston, MA 02110
Tel: 617-482-0600
Fax: 617-482-0604
E-Mail: pberman@apslaw.com

*Attorneys for the Plaintiff
Omni Development Corporation*

/s/Lee H. Kozol

Lee H. Kozol, (BBO# 278640)
FRIEDMAN & ATHERTON LLP
Exchange Place
53 State Street
Boston, MA 02109
Tel: 617-227-5540
Fax: 617-523-1559
E-Mail: lkozol@friedmanatherton.com

*Attorneys for the Defendants
Connolly and Partners, LLC, FHRC
Management Corporation, First Hartford
Corporation, and Neil H. Ellis*

Dated: December 6, 2010

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of December, 2010, I caused a true and correct copy of the foregoing Joint Motion to Stay the Litigation via the electronic filing system upon:

Lee H. Kozol
Friedman & Atherton
Exchange Place
53 State Street
Boston, MA 02109
lkozol@friedmanatherton.com

*Attorneys for Defendants
Connolly and Partners, LLC,
FHRC Management Corporation,
First Hartford Corporation, and
Neil Ellis*

and first class mail, postage prepaid, upon Reach and Apply Defendant and Trustee Process Defendants as follows:

Rockville Bank
Big Y Manchester
234 Tolland Turnpike
Manchester, CT 06040

Rockland Trust
288 Union Street
Rockland, MA 02370

Bank of America, N.A
60 State Street
Boston, MA 02109

RBS Citizens Bank
28 State Street
Boston, MA 02109

Sovereign Bank
75 State Street
Boston, MA 02109

Fidelity Management and Research Company
10 Post Office Square
Boston, MA 02109

Wainwright Bank & Trust Company
63 Franklin Street
Boston, MA 02110

Eastern Bank
265 Franklin Street
Boston, MA 02110

Mechanics Cooperative Bank
308 Bay Street
Taunton, MA 02780

/s/Pamela E. Berman
Pamela E. Berman

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